

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**In re: AT&T INC. CUSTOMER DATA
SECURITY BREACH LITIGATION**

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**Case No. 3:24-cv-00757-E
MDL No. 3114**

C. MARIO JARAMILLO’S RESPONSE TO JUNE 12, 2024 STATUS REPORT

Undersigned Counsel (the “GFM–Yarborough Group”) represent Plaintiff C. Mario Jaramillo and respectfully submit this Response to the Status Report filed by certain other plaintiffs represented by Judge Kendall (and others) (ECF No. 56) on June 12, 2024 (the “June 12 Status Report” and the “Kendall Group”) in this matter.¹ In the June 12 Status Report, the Kendall Group states that it “will submit a proposed leadership structure within seven days.” ECF No. 56 at 1–2. Meanwhile, the GFM–Yarborough Group has been meeting and speaking with other counsel with respect to the organization of leadership in this case and would like an opportunity to have the Court consider them for leadership positions here as well.

The Kendall Group consists of well-qualified, experienced, and capable attorneys, including several with whom the undersigned have successfully worked in other cases. However, the June 12 Status Report itself acknowledges the cases will not be fully transferred as a result of the ruling by the JPML until at least June 21.² As such, the proposed leadership filing by the

¹ The undersigned have also filed cases on behalf of two additional plaintiffs, Anthony Burris and Gwendolyn Crockran. *See, Burris v. AT&T, Inc.*, Case No. 3:24-cv-01208-E (N.D. Tex. – Dallas Division) and *Crockran v. AT&T, Inc.*, Case No. 3:24-cv-01438-E (N.D. Tex. – Dallas Division). These cases have also been transferred to this Court but have not yet been formally consolidated. If these cases had been formally consolidated by now, Mr. Burris and Ms. Crockran would have joined in this Response.

² Moreover, certain other plaintiffs who are represented by qualified, experienced, and capable counsel themselves, led by W. Mark Lanier and Chris Seeger (the “Lanier–Seeger Group”) have already filed a Response to the June 12 Status Report (ECF No. 57).

Kendall Group and/or the Lanier-Seeger Group on June 19 would be premature and would limit the opportunity for other well qualified and skilled counsel to be fairly and adequately considered for leadership positions by the Court.

Indeed, cases are still being filed, which are likely to be consolidated into this case in the coming weeks. Accordingly, for the proposed class to be represented by an appropriate leadership team—representing a variety of capabilities, expertise, and backgrounds—the Court should set a schedule of deadlines for all leadership applications and responses thereto, according to a procedure that ensures all may be considered and heard on an equal basis.

Plaintiff C. Mario Jaramillo thus respectfully requests that the Court set a briefing schedule that would permit all parties and their counsel who desire to seek leadership positions to do so on an even playing field, with an adequate amount of time to do so. Such a briefing schedule would give all parties and their counsel sufficient time to attempt to self-organize and submit leadership applications for the Court to consider.

[Signature Block on Following Page]

DATED: June 14, 2024

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all counsel of record on June 14, 2024 via CM/ECF, in accordance with the Federal Rules of Civil Procedure.

/s/ Patrick Yarborough
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